

CropScience



468989-00

EPA Correspondence No. 06-11A  
July 17, 2006

Ms. Sherrie Kinard, Chemical Review Manager  
Special Review and Reregistration Division (SRRD), 7504P  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, Virginia 22202-4501

**Docket Identification Number: EPA-HQ-OPP-2005-0163**

Re: Response to the EPA Federal Register Notice (Vol. 71, No. 95, May 17, 2006,  
Pages 28693-28695) Requesting Public Comments on EPA's Health Effects  
Risk Assessment and EPA's Environmental Risk Assessment for Aldicarb

Dear Ms. Kinard:

Bayer CropScience submitted substantive comments on EPA's Health Effects Risk Assessment and EPA's Environmental Risk Assessment for Aldicarb. See our appended cover letter dated July 14, 2006. This morning, our submission, on CD, was received by the OPP Regulatory Public Docket for inclusion in Docket Identification Number EPA-HQ-OPP-2005-0163.

We are submitting paper copies and a CD of all documents directly to the Special Review and Reregistration Division (SRRD). Three paper copies are being submitted of documents that require MRID numbers (see Transmittal Document). A single paper copy is being submitted of documents that respond to EPA's risk assessments. We are not submitting paper copies of the appendices (Appendices B through E) referenced in Document #10 as these documents have already been assigned MRID numbers.

The following documents are part of this submission:

1. Bayer CropScience Response to the HED Revised Preliminary Human Health Risk Assessment for the Reregistration Eligibility Decision Document (RED) and Re-Evaluation of Dermal Absorption, Sensitivity, and Reversibility Issues: Report of the Hazard Identification Assessment Review Committee. July 14, 2006. 40 pages.
2. Bayer CropScience Response to the Revised Anticipated Residues and Dietary Exposure Analyses for the HED Human Health Risk Assessment. July 14, 2006. 19 pages.

Bayer CropScience  
2 T.W. Alexander Drive  
P. O. Box 12014  
Research Triangle Park, NC 27709  
Tel: 919 549-2000



3. Bayer CropScience Response to the Update of Incident Data Review of April 10, 1996. July 14, 2006. 6 pages.
4. Bayer CropScience Response to the Preliminary Impact Analysis for Aldicarb on Major Citrus Crops. July 14, 2006. 6 pages.
5. Tobia, A.J. and A. Blacker. 2006. Bayer CropScience's Assessment and Rebuttal of the Reference Dose as Proposed by EPA in the Health Effects Division Revised Preliminary Human Health Risk Assessment for Aldicarb Issued on May 12, 2006. Research Triangle Park, NC. Report No. G201557. July 14, 2006. 16 pages.
6. Lantz, J.L., B.M. Young, R.L. Jones and G.J. Mihlan. 2006. Adicarb Acute Dietary Risk Assessment Including Food and Drinking Water. Research Triangle Park, NC. Report No. G201350. July 14, 2006. 219 Pages.
7. Kelly, I.D., J.L. Lantz, G.J. Mihlan, A.J. Tobia and B.M. Young. 2006. Incorporating Rapid Reversibility into the Dietary Risk Assessment for Aldicarb. Research Triangle Park, NC. Report No. G201550. July 13, 2006. 33 pages.
8. Blacker, A.M., R.L. Jones, I.D. Kelly, J.L. Lantz, G.J. Mihlan, A.J. Tobia and B.M. Young. 2006. Aldicarb: Human Health Risk Assessment for Use on Currently Registered and Pending Registrations as of May 2006. Research Triangle Park, NC. Report No. G201555. July 17, 2006. 86 pages.
9. Hall, L.S. 2006. The Benefits to Agriculture of TEMIK® brand 15G Aldicarb Pesticide. Bayer CropScience. Research Triangle Park, NC. Report No. G201529. July 10, 2006. 126 pages.
10. Fisher, D., T. Ramanarayanan and R. Jones. 2006. Response to the EPA Environmental Risk Assessment for the Aldicarb Reregistration Eligibility Decision. Bayer CropScience. Research Triangle Park, NC. Report No. G201560. July 14, 2006. 23 pages (Appendix A included).
  - **Appendix B.** Moore, D.R.J., R.P. Thompson and S.I. Purbrick. 2006a. Refined Aquatic Risk Assessment for Aldicarb. Cantox Environmental Inc., Ottawa, Ontario. Study No. 201482. March 2, 2006. Study No. 201482. 234 pages. MRID No. 46796102.
  - **Appendix C.** Moore, D.R.J., S.I. Purbrick, R.S. Reed, and R.P. Thompson. 2006b. Refined Wildlife Risk Assessment for Aldicarb. Cantox Environmental Inc., Ottawa, Ontario. Study No. 201483. March 8, 2006. 493 pages. MRID No. 46796103.
  - **Appendix D.** Ramanarayanan, T. S. 2006. Refined Aquatic Ecological Exposure Assessment for Total Carbamate Residues from Aldicarb. Bayer CropScience, Stilwell, KS. Study No. ME AVY006. February 27, 2006. 75 pages. MRID No. 46796101.
  - **Appendix E.** Best, L., L. Brewer, S. Klaine and K. Solomon. 2006. Refined Ecological Risk Assessment for Aldicarb. Expert Peer Review Panel Process and Comments. Iowa State University, Springborn Smithers Laboratories, Clemson University and University of Guelph. Report No. EPR 32306. March 10, 2006. 10 pages. MRID No. 46873101.

Bayer CropScience



Please phone me at 919-549-2870 or email me at [larry.hodges@bayercropscience.com](mailto:larry.hodges@bayercropscience.com) if you have any questions regarding this submission.

Sincerely,

*Larry R. Hodges*

Larry R. Hodges, Ph.D.  
Registration Manager, Insecticides

**TRANSMITTAL DOCUMENT**

**Volume 1 of 7**

**Aldicarb  
PC Code No. 098301**

**Documents Requiring MRID Numbers  
Submitted in Response to the EPA FR Notice of May 17, 2006  
Requesting Public Comments on the  
Health Effects Risk Assessment and the Environmental Risk Assessment  
for the  
Aldicarb Reregistration Eligibility Decision**

**6 DOCUMENTS**

**TRANSMITTAL DATE**

**July 17, 2006**

**Company Contact:** Larry R. Hodges

**Telephone:** 919-549-2870

**email:** [larry.hodges@bayercropscience.com](mailto:larry.hodges@bayercropscience.com)

**Bayer CropScience  
P.O. Box 12014  
2 T.W. Alexander Drive  
Research Triangle Park, N.C. 27709**

**BIBLIOGRAPHY OF SUBMITTED DATA**

MRID Number **46891401**

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Tobia, A.J. and A. Blacker. 2006. Bayer CropScience's Assessment and Rebuttal of the Reference Dose as Proposed by EPA in the Health Effects Division Revised Preliminary Human Health Risk Assessment for Aldicarb Issued on May 12, 2006. Research Triangle Park, NC. Report No. G201557. July 14, 2006. 16 Pages.

MRID Number **46891402**

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Lantz, J.L., B.M. Young, R.L. Jones and G.J. Mihlan. 2006. Adicarb Acute Dietary Risk Assessment Including Food and Drinking Water. Research Triangle Park, NC. Report No. G201350. July 14, 2006. 219 Pages.

MRID Number **46891403**

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Kelly, I.D., J.L. Lantz, G.J. Mihlan, A.J. Tobia and B.M. Young. 2006. Incorporating Rapid Reversibility into the Dietary Risk Assessment for Aldicarb. Research Triangle Park, NC. Report No. G201550. July 13, 2006. 33 Pages

MRID Number **46898901**

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Blacker, A.M., R.L. Jones, I.D. Kelly, J.L. Lantz, G.J. Mihlan, A.J. Tobia and B.M. Young. 2006. Aldicarb: Human Health Risk Assessment for Use on Currently Registered and Pending Registrations as of May 2006. Research Triangle Park, NC. Report No. G201555. July 17, 2006. 86 Pages.

MRID Number **46891405**

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Hall, L.S. 2006. The Benefits to Agriculture of TEMIK® brand 15G Aldicarb Pesticide. Bayer CropScience. Research Triangle Park, NC. Report No. G201529. July 10, 2006. 126 Pages.

MRID Number **46891406**

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Fisher, D., T. Ramanarayanan and R. Jones. 2006. Response to the EPA Environmental Risk Assessment for the Aldicarb Reregistration Eligibility Decision. Bayer CropScience. Research Triangle Park, NC. Report No. G201560. July 14, 2006. 23 Pages.